

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

UNITED STATES OF AMERICA	)	
	)	Case No. 3:19-CR-40
v.	)	
	)	JUDGE CRYTZER
STACEY EDWARD WILLIAMS, JR.	)	

**SENTENCING MEMORANDUM**

COMES NOW the United States of America, by and through Francis M. Hamilton III, United States Attorney for the Eastern District of Tennessee, and files this sentencing memorandum pursuant to this Court's order.

The defendant was convicted at trial commencing on November 2, 2021, of aiding and abetting the distribution of fentanyl and acetyl fentanyl resulting in the death of another, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 18 U.S.C. § 2, as well as various other charges. Prior to trial, on October 31, 2021, the United States filed an Information to Establish a Prior Felony Drug Conviction pursuant to 21 U.S.C. § 851(a)(1), for the felony offense in the 3rd Circuit Court, Criminal Division, of Detroit, MI, for possession of controlled substances less than 25 grams, in case number 12-003425-01-FH. (Docs. 121, 155, and Attachment 1, Record of Conviction.) According to 21 U.S.C. § 841(b)(1)(C), if "any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 30 years and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment." Hence, the statutory mandatory term of imprisonment in this case is Life without release.

The Presentence Investigation Report ("PSR") prepared by Kharmon M. Anderson, U.S. Probation Officer, dated March 25, 2022, appropriately calculates the defendant's sentencing

guidelines in this case.<sup>1</sup> The PSR for the defendant correctly sets forth the pertinent sentencing factors of 18 U.S.C. § 3553(a). A sentence of life is appropriate in this case.

The defendant has been engaged in drug trafficking for several years, at least dating back to 2012. In early 2018, the defendant was distributing heroin on a daily basis to citizens in east Tennessee. By early November 2018, the defendant had begun distributing fentanyl and fentanyl analogues. The defendant knew the risk involved in his drug trafficking activities, as evidenced by the trial testimony of his interaction with co-defendant Joshua Catlett concerning the potency of the drugs he distributed to Catlett on November 21, 2018. Those same drugs were used by C.N.N. and resulted in his death. The defendant must be held responsible for his actions and his role in the overdose death of C.N.N. The guideline range in this case, and the statutory mandatory penalty of life imprisonment for the conviction of Count One of the Superseding Indictment, is sufficient but not greater than necessary to comply with the purposes of sentencing.

The parents of C.N.N. have indicated they may wish to be heard either orally or in writing at the sentencing hearing.

Respectfully submitted this the 15th day of April 2022.

FRANCIS M. HAMILTON III  
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<sup>1</sup> The defendant filed Objection to the PSR on April 13, 2022. The government responded to those Objections on April 15, 2022.